

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PARENTHOOD SOUTH  
TEXAS, INC., PLANNED  
PARENTHOOD CAMERON  
COUNTY, INC., PLANNED  
PARENTHOOD SAN ANTONIO,  
INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**UNOPPOSED EMERGENCY MOTION FOR CONTINUANCE**

Relator respectfully requests that the Court continue the summary judgment hearing set for August 9, 2023, to August 15, 2023. In support of this motion, Relator states as follows:

On the evening of August 2, 2023, the Court issued an order granting Defendants' motion for oral argument (Dkt. 506) and setting a hearing on the parties' motions for summary judgment for August 9, 2023, at 10:00 a.m. Dkt. 513.

Relator's counsel has a scheduling conflict with this hearing date. Andrew Stephens is out of the country and will not return until August 11, 2023. Heather Hacker lacks overnight childcare due to her husband's business trip from August 7 to August 9, 2023, preventing her from traveling to Amarillo from Austin in time for a hearing on August 9. She will also be traveling out of state on August 10 and 11. Relator's counsel thus proposes a brief continuance to allow for their attendance.

Relator's counsel conferred with counsel for Texas and counsel for Defendants before filing this motion. Both parties are unopposed to the relief requested here and are available for a hearing on August 15. Relator's counsel (copying all parties) contacted the courtroom deputy on August 3 before filing this motion to ascertain whether the Court is available on the proposed dates given the quickly approaching hearing and was informed that the Court is also available on August 15.

## CONCLUSION

Relator respectfully requests that the Court continue the summary judgment hearing to August 15, 2023.

Respectfully submitted.

/s/ Heather Gebelin Hacker

Heather Gebelin Hacker

Texas Bar No. 24103325

Andrew B. Stephens

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***Attorneys For Relator***

**CERTIFICATE OF CONFERENCE**

On August 3, 2023, in accordance with Local Rule 7.1(b), the undersigned certifies that Relator's counsel conferred with counsel for Defendants and for Texas regarding the relief requested in this motion. Both parties are unopposed.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker

**CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2023, this document was electronically filed and served via the Court's CM/ECF system.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker